

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK**

	)	Chapter 11
In re:	)	
	)	
Absolut Facilities Management, LLC, <i>et al.</i> ,	)	Case No.: 19-45422 (ESS)
	)	(Joint Administration Requested)
Debtors. <sup>1</sup>	)	
	)	

**NOTICE OF APPEARANCE  
AND REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that the undersigned hereby submits this notice of appearance in the above-captioned case on behalf of ABS DIP, LLC, and pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section 1109(b) of the Bankruptcy Code, requests that all notices given or required to be given and all papers served in these cases be delivered to and served upon the party(ies) identified below at the following address:

BODNER LAW PLLC  
Attn: Jonathan S. Bodner, Esq.  
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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: Absolut Facilities Management, LLC (1412); Absolut Center for Nursing and Rehabilitation at Allegany, LLC (7875); Absolut Center for Nursing and Rehabilitation at Aurora Park, LLC (8266); Absolut Center for Nursing and Rehabilitation at Gasport, LLC (8080); Absolut Center for Nursing and Rehabilitation at Orchard Brooke, LLC (1641); Absolut Center for Nursing and Rehabilitation at Orchard Park, LLC (8300); Absolut Center for Nursing and Rehabilitation at Three Rivers, LLC (8133); and Absolut Center for Nursing and Rehabilitation at Westfield, LLC (7924).

**PLEASE TAKE FURTHER NOTICE** that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the above-mentioned Bankruptcy Rules, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, requests, complaints or demands, whether formal or informal, written or oral, transmitted or conveyed by mail delivery, telephone, facsimile or otherwise, in these cases.

**PLEASE TAKE FURTHER NOTICE** that this appearance is not intended nor shall be deemed to waive any: (i) right to contest the subject matter jurisdiction of this Court; (ii) right to have final orders in noncore matters entered only after *de novo* review by a district court judge; (iii) right to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related hereto; (iv) right to seek abstention or withdrawal of reference; or (v) other rights, claims, actions, defenses, setoffs or recoupments under agreements, at law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: September 11, 2019

Respectfully submitted,

BODNER LAW PLLC

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